

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SVEN SUNDGAARD,

Plaintiff,

v.

MULTIMEDIA HOLDINGS
CORPORATION, d/b/a KARE-TV and
d/b/a KARE-11; TEGNA, Inc.,

Defendants.

Case No. 0:21-cv-00999

DECLARATION OF NIKKI MILLS

I, Nikki Mills, declare and state as follows:

1. I make this Declaration in support of the Notice of Removal of Defendants Multimedia Holdings Corporation, d/b/a KARE-TV and d/b/a KARE-11 (“MHC”), and TEGNA Inc. (“TEGNA”)¹ (collectively “Defendants”) in the above-entitled action. I have been employed by TEGNA as Group Human Resources Director for TEGNA since February 21, 2017.

2. The following facts are based on my own personal knowledge or based on my review of documents kept in the ordinary course of business by Defendants and if called as a witness, I could testify as to their accuracy.

3. In my capacity as Group Human Resources Director for TEGNA, I have control of and access to personnel and human resources records, including pay records, of current and former employees of MHC. MHC is a licensee of KARE-TV, and MHC is owned by and a subsidiary of TEGNA.

4. In this position, I have also developed knowledge regarding both TEGNA and MHC’s businesses, operations, and corporate structures. I have reviewed the files and records necessary to provide the information set forth in this declaration.

¹ Incorrectly named in the caption as “TEGNA, Inc.”

5. TEGNA has no parent corporation. BlackRock, Inc. owns 10% or more of TEGNA's stock. TEGNA is now, and at all relevant times since this action commenced in March 2021, has been incorporated under the laws of the State of Delaware. TEGNA's principal place of business is, and has been since this action commenced, Tysons, Virginia. From its headquarters in Tysons, Virginia, TEGNA conducts its primary operations, including, but not limited to, those relating to TEGNA's operations, policies and procedures, as well as the core functions of human resources, legal affairs, marketing, tax, benefits, information technology, and finance. The majority of TEGNA's high-level executives maintain their offices in Tysons, Virginia, where they direct, control, and coordinate TEGNA's activities and which is the location of the majority of its administrative and managerial activities and the primary, permanent base of its operations.

6. MHC is a licensee of KARE-TV. MHC is owned by and a subsidiary of TEGNA. MHC is now, and at all relevant times since this action commenced in March 2021, has been incorporated under the laws of the State of South Carolina. MHC's principal place of business is, and has been since this action commenced, Tysons, Virginia. From its headquarters in Tysons, Virginia, MHC conducts its primary operations, including, but not limited to, those relating to MHC's policies and procedures, human resources, legal affairs, marketing, tax, benefits, information technology, and finance. The majority of MHC's high-level executives maintain their offices in Tysons, Virginia, which is the location of the majority of its administrative and managerial activities, and the primary, permanent base of its operations.

7. I accessed and reviewed the personnel and pay records for Plaintiff Sven Sundgaard ("Plaintiff"). Plaintiff was an employee with TEGNA from February 27, 2006 to May 1, 2020, and throughout his employment, he worked in Minneapolis, Minnesota. As part of his Application for Employment, Plaintiff provided TEGNA with his home address in Duluth, Minnesota. Plaintiff's records with TEGNA also show that he listed his home address in Minnesota as his residence for purposes of his personnel file, payroll checks, and tax withholdings. His most recent home address on file with TEGNA is 222 Hennepin Avenue,

Apartment 504, Minneapolis, Minnesota 55401.

8. At the time of his separation from employment on May 1, 2020, Plaintiff was a full-time employee at an annual salary of \$160,000.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the State of Minnesota and of the United States of America that the foregoing is true and correct.

Executed on this 14 day of April, 2021 at Minneapolis, Minnesota.

A handwritten signature in dark ink, appearing to read "Nikki Mills", written over a horizontal line.

Nikki Mills

Group Human Resources Director
TEGNA Inc.